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MEMO ENDORSED
April 24, 2023 4/25/23

By ECF Filing

Hon. Colleen McMahon
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007

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Colleen McMahon

Re: Raul Rivera v. United States
Docket No. 23 Cv. 768 (CM) and 98 Cr. 290 (CM)

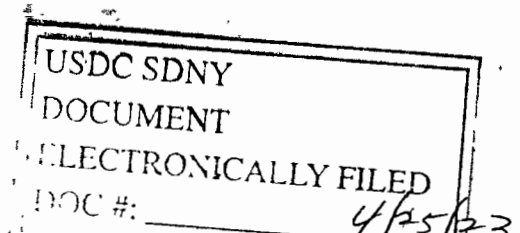
Dear Judge McMahon:

I represent the plaintiff (and defendant) Raul Rivera in the above-referenced matters. I write now to request that the time to respond to the Government's opposition to the 2255 Petition be extended for an additional 30 days to May 24, 2023.

The additional time is needed to review the matter with Mr. Rivera and to prepare a Reply and to visit Mr. Rivera at FCI Schuylkill, which because of commitments in other matters for CJA and non-CJA clients I have been unable to do.


In addition, last week I received a copy of a *pro se* motion for compassionate release filed by Mr. Rivera. I also would like the additional time to review that matter with him and to supplement his *pro se* submission. I anticipate being able to complete a Reply regarding the 2255 Petition and to prepare a supplement to the Compassionate Release motion by May 24, 2023.

I have communicated with AUSA Gillian Grossman regarding these requests and am authorized to represent that the Government consents to these requests being granted.



Thank you for the Your Honor's consideration of these requests.

Respectfully submitted,



John F. Kaley

cc: AUSA Gillian Grossman
AUSA Alexandra Messiter
(both via ECF filing)